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**Linda McCulloch**  
Superintendent

DATE: January 26, 2007

TO: School Food Authorities (SFAs)

FROM: Christine Emerson, Director, School Nutrition Programs

SUBJECT: Vending Machines in the School Meal Programs

The Food and Nutrition Service (FNS) is aware that there is a growing interest among school food authorities (SFA) on the use of vending machines in the school meals programs. The following material is intended to provide interim guidance for SFAs that are considering whether a meal vending machine could be successfully incorporated into their National School Lunch (NSLP) and School Breakfast Programs (SBP).

SFAs must be aware that any vending machine that provides a reimbursable school meal is subject to all program regulations and represents an extension of the school food service area. Therefore, school meal vending machines are subject to the same procedures, menu planning requirements, competitive food rules, and offer versus serve requirements that are applicable to meals offered on a service line with a cashier. Also, as a reminder, any use of Program funds for obtaining and maintaining vending machines to provide reimbursable meals must be in accordance with the procedures set forth in 7 CFR 210.21, as applicable, concerning the procurement of supplies, food, equipment, and services.

It is the SFA's responsibility for ensuring that a vending machine used to serve reimbursable meals is operated in compliance with program regulations. For example, the SFA must ensure that a machine can properly dispense a reimbursable meal and accurately document when a reimbursable meal has been selected by an eligible student. Moreover, SFAs will need to ensure that the use of the vending machine does not allow an eligible student to receive more than one reimbursable meal per service period (one meal through the lunch line and a second meal through the vending machine). It is critical that any identity confirmation procedure does not overtly identify a child as receiving a free or reduced price meal. Additionally, as a reminder, all reimbursable school meals, including vended meals, must be priced as a unit.

Prior to the use of vending machines to serve reimbursable meals, an SFA must notify their State agency (SA) of their intent to do so. The SA would include the vending machines in any administrative review to ensure that these machines, and their use, are in compliance with Program regulations.

FNS recognizes that vending machines may play an expanding role in the operation of the National School Lunch and School Breakfast Program. Personnel policies, labor costs, pressure on lunch room space, class schedules, and limited time all contribute to the need to explore more efficient and effective methods of delivering these important nutrition benefits to students. School Nutrition Programs believes that it is critical to work with schools to ensure the proper delivery of program services to students without unnecessarily inhibiting innovation.

Due to the developing nature of FNS guidance regarding the operation and management of vending machines in the NSLP or SBP, please contact School Nutrition Programs at (406) 444-2501 if you have specific questions.